

1 LAW OFFICE OF WILLIAM J. HEALY
2 WILLIAM J. HEALY, #146158
3 748 Holbrook Pl.
Sunnyvale, CA 94087
Telephone: (408) 373-4680

4 ATTORNEYS FOR
5 ELDENA CROSS, INDIVIDUALLY AND
AS TRUSTEE OF THE CROSS FAMILY
TRUST DATED NOVEMBER 12, 2008

In re:) Case No. 22-22056-A-7
DAVID R. MICHAL,) CHAPTER 11
Debtor.)
NOTICE OF APPEARANCE AND
REQUEST FOR SPECIAL NOTICE
)

**TO THE HONORABLE FREDERICK E. CLEMENT, UNITED STATES BANKRUPTCY
JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, DEBTOR(S), ALL
INTERESTED PARTIES, AND ALL PARTIES ENTITLED TO NOTICE:**

Please take notice that creditor and party-in-interest ELDENA CROSS, INDIVIDUALLY AND AS TRUSTEE OF THE CROSS FAMILY TRUST DATED NOVEMBER 12, 2008 (jointly "Cross" or "CROSS") hereby appears in the above-captioned bankruptcy case, by and through its counsel the Law Office of William J. Healy and hereby requests that all notices given or required to be given in this case to creditors or any other party in interest, whether given by the Court, the debtor(s), any trustee, any creditor or any other party in this case, and all papers served or required to be served in connection with this case, be served on such counsel for CROSS.

This request includes, without limitation, all notices and documents required to be provided under Bankruptcy Rule 2002(a), (b), (f), and Bankruptcy Rule 2015.3(b).

11

1 All notices given or required to be given in light of the foregoing should be served at the
2 following address:

3 William J. Healy, Esq.
4 Law Office of William J. Healy
5 748 Holbrook Pl
6 Sunnyvale, CA 94087
7 (email) wjhealy7@gmail.com
8 (p) 408-373-4680

9 In addition, pursuant to Bankruptcy Rule 2002(g), CROSS requests that the foregoing names
10 and addresses be added to the Court's master mailing list.

11 Neither this request for special notice nor any subsequent appearance,
12 pleading, claim, proof of claim, document, suit, motion nor any other writing or conduct,
13 shall constitute a waiver of CROSS's:

14 (a) right to have any and all final orders in any and all non-core matters
15 entered only after de novo review by a United States District Court Judge;

16 (b) right to trial by jury in any proceeding as to any and all matters so
17 triable herein, whether or not the same be designated legal or private rights, or in any case,
18 controversy or proceeding related hereto, notwithstanding the designation of such matters
19 as "core proceedings" pursuant to 28 U.S.C. section 157(b)(2), and whether such jury trial
20 right is pursuant to statute or the United States Constitution;

21 (c) right to have the reference of this matter withdrawn by the United
22 States District Court in any matter or proceeding subject to mandatory or discretionary
23 withdrawal; and

24 (d) other rights, claims, actions, defenses, setoffs, recoupments or other
25 matters to which CROSS is entitled under any agreements or at law or equity or under
26 the United States Constitution.

27 CROSS expressly reserves and preserves all such rights without
28 exception and with no purpose of confessing or conceding the jurisdiction or venue of the
Court or venue of the case in any way by this filing.

Dated: January 9, 2023

LAW OFFICE OF WILLIAM J. HEALY

/s/ William J. Healy
William J. Healy